

JUDGE HELLERSTEIN

Jason M. Drangel (JD 7204)
jdrangel@ipcounselors.com
Ashly E. Sands (AS 7715)
asands@ipcounselors.com
Brienne Scully (BS 3711)
bscully@ipcounselors.com
Danielle S. Yamali (DY 4228)
dfutterman@ipcounselors.com
EPSTEIN DRANGEL LLP
60 East 42nd Street, Suite 2520
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiff
Telebrands Corp.

20 CV 9775

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TELEBRANDS CORP.,

Plaintiff

v.

AM DEVOTEE STORE, ATRIH NINGBO IMPORT &
EXPORT CO., LTD., AUTOMOBILE AD
MOTORCYCLE PARTS STORE, AUTOS
DROPSHIPPING'S STORE, BENGBU HANYU NEW
ENERGY TECHNOLOGY LIMITED, BRAND-NEW
WAY STORE, CAR 999 STORE, CAR
ACCESSORIES DISCOUNT STORE, CAR CAR
CAR!!! STORE, CAR TOOL STORE, CAR WITH
YOU STORE, CHANGSHU JUHAO CLEAN
TEXTILE CO., LTD., COOLEST-TOPEST STORE,
DONGGUAN ZHONGSEN NEW MATERIAL CO.,
LTD., DROP SHIPPING CAR ACCESSORIES
STORE, FANTASTICCAR STORE, GOOD
COMFORTABLE STORE, HANGZHOU JIUZE
TECHNOLOGY CO., LTD., HANGZHOU
MOSHENG TEXTILES CO., LTD., HD-CAR STORE,
HELIUS 777 STORE, HENAN HUAXIN IMPORT &
EXPORT TRADE CO., LTD., HENAN RUOZHEN
TRADING CO., LTD., HONDAR MACHINERY CO.,
LTD., JANNEY ILLIMITABLE AMPLIFY STORE,
LIGHT OF EC CHINA STORE, LUNA'S CAR
HOUSE STORE, MOSTEST STORE, NINGBO
FINELIFE PRODUCTS INTL TRADING CO., LTD.,

CIVIL ACTION No. _____

~~PROPOSED~~ ORDER
TEMPORARILY SEALING
FILE

FILED UNDER SEAL

NINGBO KINGWORTH GLOBAL IMP. & EXP. CO., LTD., NINGBO SONGXING METAL CO., LTD., NINGBO SUNAIR HOUSEWARE CO.,LTD, NINGBO XINKE INDUSTRIAL & TRADING CO., LTD., ONLINE CAR STORE, PROFESSION PICK STORE, PROMETHEUSS 777 STORE, RYAN-CAR STORE, SHAOXING JINYI TRADING CO., LTD., SHENZHEN FUYUAN GIFT LTD., SHOP5123097 STORE, SHOP5497252 STORE, SHOP5777765 STORE, SHOP5797644 STORE, SHOP5800663 STORE, SHOP5873953 STORE, SHOP910316358 STORE, SILVER MOO STORE, STEAM FRICTION STORE, TO BE PROFESSIONAL STORE, WORTHWHILE DECISION STORE, WUHAN RUIYU TENGFEI TRADING CO., LTD., YIWU HONGYI COMMODITY PURCHASING CO., LTD. and YIWU XIAOHUA HOUSEHOLD GOODS FACTORY,

Defendants

On this day, the Court considered Plaintiff's Application to Temporarily File Under Seal and it is hereby ORDERED that the Clerk of the Court shall maintain the documents associated with the above-referenced action, including, but not limited to, Plaintiff's Complaint and exhibits attached thereto and Plaintiff's *ex parte* application for: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts and Defendants' Assets with the Financial Institutions; 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service; and 5) an order authorizing expedited discovery and the supporting declarations of Bala Iyer and Jason M. Drangel and exhibits attached thereto under seal for a period of one (1) week, or until further order by the Court.

It is also hereby ORDERED that, notwithstanding this Order to Temporarily Seal File, the Clerk of the Court shall have authority to provide Plaintiff with certified copies of any orders entered in this matter while under seal.

SIGNED this 19 day of Nov., 2020, at 1:10 P.m.



UNITED STATES DISTRICT JUDGE

Part I